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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA GONZÁLEZ, FREDDY JOSE ARAPE RIVAS, M.H., CECILIA DANIELA GONZÁLEZ HERRERA, ALBA CECILIA PURICA HERNÁNDEZ, E.R., HENDRINA VIVAS CASTILLO, A.C.A., SHERIKA BLANC, VILES DORSAINVIL, and G.S.,

Case No. 3:25-cv-01766-EMC

**DECLARATION OF EMILOU MACLEAN
IN SUPPORT OF MOTION FOR
COMPLIANCE WITH COURT ORDER
[ECF 279]**

Plaintiffs,

VS.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA

Defendants.

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1 I, Emilou MacLean, declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
 3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of
 4 record in this action for Plaintiffs. I make this declaration in support of Plaintiffs' Motion for
 5 Compliance with Court Order [ECF 279] ("Motion for Compliance"). I have personal knowledge of
 6 the following facts and, if called as a witness, I could and would testify competently as follows.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the USCIS webpage
 8 regarding Venezuela's TPS designation as it appeared on Tuesday, September 9, 2025 at 19:56
 9 GMT.

10 3. On Monday, September 8, 2025, I emailed Defendants' counsel to confirm that
 11 Defendants would update the USCIS webpage concerning Venezuela's TPS designation in light of
 12 this Court's September 5, 2025 order (ECF 279). Defendants' counsel responded that: "The website
 13 will not be updated today. Defendants are assessing their obligations under Judge Chen's ruling,
 14 which did not include any injunctive order to immediately update the website. Defendants also note
 15 they have moved for a stay of judgment pending appeal, which has yet to be ruled upon by the
 16 Court." On September 9, 2025, I responded and informed Defendants that Plaintiffs would move for
 17 Defendants' compliance with this Court's September 5, 2025 order and requested Defendants'
 18 position on Plaintiffs' forthcoming motion. Defendants' counsel responded: "Defendants dispute the
 19 allegations of noncompliance and will oppose both the motion for compliance as well as any
 20 associated motion to shorten time." A true and correct copy of this email exchange is attached as
 21 **Exhibit B.**

22 4. Attached hereto as **Exhibit C** is a true and correct copy of the USCIS webpage
 23 regarding Haiti's TPS designation as it appeared on Tuesday, September 9, 2025 at 21:17 GMT.

24 I declare under penalty of perjury that the foregoing is true and correct, and that this
 25 declaration was executed in San Francisco, California this 9th of September, 2025.

26 /s/ Emilou MacLean
 27
 28 Emilou MacLean